

## REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-7, 9-45 and 47-72 are currently pending. Claims 1, 15, 22, 34, 58 and 70 are independent and are hereby amended. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed.

Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### II. REJECTIONS UNDER 35 U.S.C. §103

Claims 1, 3, 5, 7, 15, 17, 19, 21-24, 26-36, 38-45, 58-60 and 62-72 were rejected under 35 U.S.C. §103 as allegedly unpatentable over U.S. Patent No. 7,154,534 to Seki et al. (hereinafter, merely “Seki”) in view of U.S. Patent No. 6,061,532 to Bell; and

Claims 2, 4, 6, 16, 18, 20, 25, 37 and 61 were rejected under 35 U.S.C. §103 as allegedly unpatentable over Seki and Bell and further in view of U.S. Patent No. 7,020,381 to Kato et al. (hereinafter, merely “Kato”).

Applicant respectfully traverses this rejection.

Independent claim 1 is representative and recites, *inter alia*:

“ . . .the template is a scene arrangement sequence for the plurality of scenes set in advance for a story structure of the video content and prior to editing

... .

... .the template includes a timeline set prior to editing for each scene and audio setting based on the timeline.”

Claim 1 recites, “. . .the template is a scene arrangement sequence for the plurality of scenes set in advance for a story structure of the video content and prior to editing . . . the template includes a timeline set prior to editing for each scene and audio setting based on the timeline..” That is, in this aspect of the invention, the template is a sequence of scenes determined in advance prior to editing to create a certain video project.

In this aspect, the content project data is created using the template in which the scene arrangement has been set in advance prior to creation of the project data. The template is a data file having the scene arrangement of video content and timeline for each scene. The timeline is, therefore, determined prior to editing. Publ. App. par. [0120].

Moreover, the template further includes an adjustment of audio insertion of, for example, background music or narration. based on the timeline of the scene in the template prior to editing. Publ. App. par. [0124].

A feature of the aspect of the invention is enabling a non-expert video shooter to produce content of high quality because the content project data can be created easily and the video shooter can check the outline of the project and the shooting result by playing the content project data and the video image data in the sequence of the content at an arbitrary time. Publ. App. par. [0351].

The Office Action points to Bell for the above features of the present invention. In particular, the Office Action points to Bell, col. 3, lines 20-35. As understood by Applicant, Bell describes an apparatus for creating personalized story presentations, such as video movies, prepared with the aid of a kit including a film camera, pose instruction set and chroma-key backdrop. Bell, Abstract. However, there is no suggestion in Bell there is a template that includes a specific, predetermined timeline for the scenes. Moreover, the Kato reference is a video editor that includes a timeline that is post-production. That is, the timeline for each scene is not determined prior to editing in a template for the scene prior to adding content to the scene.

For reasons similar or somewhat similar to those described above with regard to independent claim 1, independent claims 15, 22, 34, 58 and 70 are also believed to be patentable.

### **III. DEPENDENT CLAIMS**

The other claims are dependent from one of the claims discussed above and are therefore believed patentable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### **CONCLUSION**

Claims 1-7, 9-45 and 47-72 are in condition for allowance. In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited

reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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